

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

LUCAS CALIXTO, *et al.*,

Plaintiff,

vs.

DEPARTMENT OF THE ARMY, *et al.*,

Defendants.

Civil Action No. 18-1551 (ESH)

**DEFENDANT'S NOTICE OF FILING**  
**THE CERTIFIED INDEX OF THE ADMINISTRATIVE RECORD**

In accordance with Local Civil Rule 7(n)(1), Defendants the Department of the Army and the Secretary of the Army Dr. Mark T. Esper, by and through counsel, hereby file the attached certified index of the contents of the administrative record.

Dated: May 31, 2019

Respectfully submitted,

JESSIE K. LIU, D.C. Bar # 472845  
United States Attorney

DANIEL F. VAN HORN, D.C. Bar # 924092  
Chief, Civil Division

BY: /s/ Roberto C. Martens, Jr.  
ROBERTO C. MARTENS, JR.  
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Civil Division  
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*Attorneys for Defendants*

**CERTIFICATE OF SERVICE**

I certify that on this 31st day of May, 2019, I served upon counsel for Plaintiffs the foregoing notice of filing the certified index of the administrative record and the certified index by filing said documents using the Court's Electronic Case Filing System.

Dated: May 31, 2019

/s/ Roberto C. Martens, Jr.  
ROBERTO C. MARTENS, JR.  
Special Assistant United States Attorney

# United States of America



## DEPARTMENT OF THE ARMY

Washington, DC

PLACE

May 31, 2019

DATE

I HEREBY CERTIFY that the attached are true and accurate copies of files pertaining to Lucas Calixto, Tounde Djohi, Wanjing Li, Fang Lu, Hembashima, Guan Qu, Emeka Udeigwe, Xing Lu, and Bright Izudike, members of the United States Army Reserve. Zeyu Sheng Dai are former members of the United States Army Reserve. The record includes documents from the Office of the Assistant Secretary of the Army, Manpower and Reserve Affairs, Army Deputy Chief of Staff, G-1, United States Army Reserve Command and Army Recruiting Command. Copies of these records are in the official temporary custody of the Military Personnel Litigation Branch, Litigation Division, Office of the Judge Advocate General of the Army.

*Edward Bahdi*

EDWARD BAHDI

Lieutenant Colonel, U.S. Army

Chief, Military Personnel Litigation Branch

I HEREBY CERTIFY that Lieutenant Colonel Edward Bahdi, who signed the foregoing certificate, is the Chief, Military Personnel Litigation Branch, Litigation Division, Office of the Judge Advocate General of the Army, and that full faith and credit shall be given to his certification.

IN TESTIMONY WHEREOF I, Kathleen S. Miller

The Administrative Assistant to the Secretary of the Army,  
have hereunto caused the seal of the Department of the  
Army to be affixed this 31st day of

May, 2019

By *Patrick B. Grant*

Administrative Assistant.

**PATRICK B. GRANT**  
**Lieutenant Colonel, U.S. Army**  
**Acting Chief, Litigation Division**

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2.	Lucas Calixto MAVNI Information Paper	March 10, 2016	000012-000019
3.	Military Service Suitability Recommendation and National Security Determination re: Lucas A. Calixto	June 5, 2018	000020-000031
4.	Department of the Army Form 4187 (Personnel Action) re: Lucas A. Calixto	April 19, 2018	000032-000033
5.	United States Army Recruiting Battalion New England Discharge Order 163-1	June 12, 2018	000034
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9.	Determination of the Military Service Suitability of PV1 Calixto, Lucas A.	June 7, 2018	000041-000042
10.	Tounde Emery Preceiux Djohi Reserves Annex	December 17, 2015	000043-000053
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13.	United States Army Reserve Command Orders 18-164-00005 re: Tounde EmeryPrecieux Djohi	June 13, 2018	000063
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17.	Military Service Suitability Recommendation and National Security Determination re: SPC Tounde Emery Precieux Djohi	June 15, 2018	000075-000085
18.	Yisheng Dai Reserves Annex	October 29, 2015	000086-000096
19.	Yisheng Dai MAVNI Information Paper	October 27, 2015	000097-000104
20.	Department of the Army Form 4187 (Personnel Action) re: Yisheng Dai	June 14, 2018	000105
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23.	Record Summary - Contacts re: Yisheng Dai	Various Dates	000111-000120
24.	Zeyuan Li Reserves Annex	April 20, 2016	000121-000132
25.	Zeyuan LI MAVNI Information Paper	October 27, 2015	000133-000140
26.	TPU Personnel Actions Checklist re: Zeyuan Li	November 17, 2017	000141-000142
27.	U.S. Army Recruiting Battalion, Harrisburg Orders 298-1 re: Zeyuan Li	October 25, 2017	000143
28.	Department of the Army Form 4187 (Personnel Action) re: Zeyuan Li	January 15, 2019	000144-000145
29.	U.S. Army Recruiting Battalion, Harrisburg, Orders 298-1 re: Zeyuan Li	October 25, 2017	000146

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38.	Declaration of Lin H. St. Clair and Exhibit A, Case 1:18-cv-01551-ESH, Document 22-1	August 13, 2018	000179-000195
39.	Bright Chukwudi Izudike Reserves Annex	December 17, 2015	000196-000206
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45.	U.S. Army Recruiting Battalion, Baltimore Orders 187-002 re: Fang Lu	July 6, 2018	000222
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61.	U.S. Army Recruiting Battalion, Cleveland Order No. 186-01 re: Emeka Udeigwe	July 5, 2018	000334
62.	Assumption of Command Orders for United States Army Recruiting Battalion Cleveland	June 25, 2018	000335
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69.	Certification of Military or Naval Service (USCIS Form N-426) re: Wanjing Li (certification section not completed)	August 13, 2016 (requestor's signature)	000373-000376
70.	Assistant Secretary of the Army, Manpower and Reserve Affairs Memorandum for Deputy Chief of Staff, G-1, Subject: Resume Separation Actions Pertaining to Members of the Delayed Entry Program (DEP) and Delayed Training Program (DTP) Recruited Through the Military Accessions Vital to National Interest (MAVNI) Pilot Program	October 26, 2018	000377-000379